



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
AND ENVIRONMENTAL CONTROL
DIVISION OF AIR AND WASTE MANAGEMENT
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34112

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COVER SHEET

X-09/11 - Caller
at 2:00 PM
11/22/94 - Miller

TO: Kate H. Gell (34112)

FROM: Anne Miller

DATE: 11/22/94

MESSAGE: _____

Number of pages including this cover sheet: 3

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November 22, 1994

Kate Lose (3HW42)
U.S. EPA, EPA Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

RE: Work Plan for Additional Ecological Study (August 9, 1994)
Prepared by Standard Chlorine of Delaware, Inc.

Dear Ms. Lose:

The Department reviewed the work plan for additional ecological investigation (August 9, 1994) prepared by Standard Chlorine and believes that the document merits review by EPA, as we discussed prior to and during our meeting on October 20, 1994. The Department's comments are as follows:

1. The Department supports the statistically based approach to evaluating the data collected during the ecological monitoring. A rigorous approach to analyzing the data is necessary and it is good to see that the need for such an approach is recognized and incorporated into the plan.
2. The Department understands EPA's reluctance to reopen the soil/sediment cleanup level discussion, after so much work on the issue has already occurred and decisions already made. However, we believe that the technical approaches in parts of the work plan have merit and could be used for ecological monitoring, especially when combined with other monitoring activities we have already discussed. We do not want to lose the usefulness of the statistical approach discussed in the work plan.
3. The Department believes that community assessment techniques, such as those discussed in the work plan, can be effectively used as part of the ecological monitoring activities at the site in conjunction with additional activities.

Delaware's good nature depends on you!

Kate Lose (3HW42)

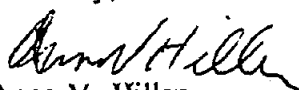
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4. The Department hopes that the general approach for monitoring the progress of bioremediation at the site is able to be retained for consideration during RD/RA workplan development.

If you have any question about these comments, please contact me. We are interested in hearing EPA's comments on the work plan.

Sincerely,



Anne V. Hiller
Environmental Scientist III
Superfund Branch

AVH:dw
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